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Nick Mirr Federal Defenders of Eastern Washington and Idaho 306 E. Chestnut Ave. Yakima, Washington 98901 509.248.8920 Attorneys for Andrei Stephanovich Borgheriu

> United States District Court Eastern District of Washington Honorable Stanley A. Bastian

United States of America,

Plaintiff,

v.

Andrei Stephanovich Borgheriu,

Defendant.

No: 4:22-cr-06040-SAB

Amended Defendant's Exhibit List

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Mr. Borgheriu provides notice that he intends to introduce the following exhibits in his case in chief:

Defense Exhibit	Admitted	Description	Bates
201		Photograph – Mr. Borgheriu's Truck	FD00000070
202		Photograph – Home Office	FD00000003
203		Photograph – Garage Office Area	FD0000004
204		Photograph – Home Office	FD00000005
205		Photograph – Tires	FD00000006
206		Photograph – Inside of Shed	FD00000007
207		Photograph – Inside of Shed	FD00000008
208		Photograph – Tires	FD00000009
209		Artway Transport Check Stubs	FD00000016- FD00000061
210*		2022 Business License	FD00000062
211*		Transportation Certificate (first page subject to stipulation)	FD00000063- FD00000065
212		International Fuel Tax Agreement	FD00000066
213		Certificate of Insurance	FD00000067
214*		Employer Identification Number	FD00000068- FD00000069
215		Drivers Daily Log	FD00000071- FD00000194
216		Promissory Note	FD00000195- FD00000197
217		Registration Certificate	FD00000198
218		Vehicle Certificate of Title	FD00000199

FD00000221

FD00000200-FD00000202 FD00000203-

FD00000205 FD00000206-

FD00000208

FD00000209-FD00000211

FD00000212-FD00000214 FD00000215-

FD00000217

FD00000218-FD00000001-FD000000010-FD00000015

FD10000043

1	219*	Secretary of State Certificate of Formation – 2018	
2	220*	Secretary of State Amended Annual Report – 2018	
3	221*	Secretary of State Annual Report - 2019	
4	222*	Secretary of State Annual Report – 2020	
5	223*	Secretary of State Express Annual Report with Changes – 2021	
	224*	Secretary of State Express Annual Report with Changes – 2022	
6	225*	Secretary of State Annual Report – 2023	
7	226*	Secretary of State Express Annual Report with Changes – 2024	
8	227	Load Records	
9	228	Business Receipts	
10	229	Rights Advisement	

<sup>\*</sup> Subject to parties' stipulation.

Mr. Borgheriu reserves the right to seek admission of any exhibit on the United States' exhibit list, to supplement this list as trial proceeds, or to present impeachment exhibits as many be appropriate during trial.

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1	Dated: February 5, 2025
2	Federal Defenders of Eastern Washington and Idaho
3	Attorneys for Andrei Borgheriu
4	<u>s/ Nick Mirr</u> Nick Mirr, AT0014467
5	Iowa State Bar Ass'n 306 E. Chestnut Ave.
6	Yakima, Washington 98901 t: (509) 248-8920
7	nick_mirr@fd.org
8	
9	Service Certificate
10	I certify that on February 5, 2025, I electronically filed the foregoing with the
11	Clerk of the Court using the CM/ECF System, which will notify Assistant United
12	States Attorneys: Jeremy J. Kelley and Frieda K. Zimmerman.
13	<u>s/ Nick Mirr</u> Nick Mirr, AT0014467
14	Iowa State Bar Ass'n
15	306 E. Chestnut Ave. Yakima, Washington 98901
16	t: (509) 248-8920 nick_mirr@fd.org
17	
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19	
	Amended Defense Exhibit List